

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

00-0494

00-0494

2011-11-13

ILLINOIS COMMERCE COMMISSION :

On Its Own Motion, :

-vs- :

Central Illinois Light Company, et al., :

Respondents, :

Proceeding On the Commission's Own :
Motion Concerning Delivery Services :
Tariffs Of All Illinois Electric Utilities To :
Determine What If Any Changes Should Be :
Ordered To Promote Statewide Uniformity :
Of Delivery Services and Related Tariffed :
Offerings. :

Docket No. 00-0494

Direct Testimony of

LAWRENCE S. ALONGI

Director, Distribution Pricing
Commonwealth Edison Company

November 3, 2000

ComEd Ex. 2.0 Revised

1 Q. Please state your name and business address.

2 A. Lawrence S. Alongi. Commonwealth Edison Company, P.O. Box 805379, Chicago,
3 Illinois 60680-5379.

4 Q. Mr. Alongi, by whom are you employed and in what position?

5 A. I am employed by Commonwealth Edison Company ("ComEd" or the "Company") in the
6 position of Director, Distribution Pricing.

7 Q. Please describe your educational background and business experience.

8 A. I have a Bachelor of Science degree in Electrical Engineering from Northwestern
9 University. I have been employed by ComEd since July 1974. During my employment
10 with ComEd I have had assignments in field engineering, project engineering,
11 distribution planning, system planning, distribution engineering, and rates. I have held
12 positions as District Engineering Supervisor, Area Engineering Supervisor, Planning
13 Supervisor, Assistant Division Engineer, Division Engineer, and Senior System Rate
14 Administrator. In March 1998, I assumed my present position and became a member of
15 the Edison Electric Institute Economic Regulation and Competition Committee.

16 Q. Mr. Alongi, what are your current duties and responsibilities?

17 A. My primary duties are to plan and direct the development and implementation of the
18 Company's retail tariffs and revisions to such tariffs. These duties include the planning
19 and direction of ComEd's rate design, cost of service activities, and rate administration. I
20 also direct the preparation of the necessary filing of such tariffs with the Illinois
21 Commerce Commission (the "Commission" or "ICC").

22 Purpose

23 Q. What is the purpose of your testimony?

24 A. The purpose of my testimony is to address certain tariff uniformity issues upon which
25 parties to this docketed proceeding did not reach consensus during the workshop process.
26 Specifically, I will address tariff uniformity issues relating to the following topics as
27 stated in the Stipulation (the "Stipulation") that was attached to the Commission's Interim
28 Order dated October 18, 2000, in this docket:

29
30 Transition Charge Tariff Issues for Utilities Currently Collecting CTCs

- 31 • "How and where is the class of customers with individual CTCs defined?"
32

33 Default Service

- 34 • "What are the basic terms and conditions of default service?"
35 • "Under what conditions are customers eligible for Default Service?"
36

37 Customer/Supplier Tariff

- 38 • "What standard definitions should be included in delivery services tariff?"
39

40 Other Tariff Issues

- 41 • "Which tariffs contain references to the Terms and Conditions of other tariffs?
42 Should tariffs have a standard structure, organization, and section layout within each
43 tariff? Is there a standard structure and layout of rates within the rate book?"
44

45 ComEd's Schedule Of Rates

46 Q. What is ComEd's "Schedule Of Rates For Electric Service"-- Ill. C.C. No. 4?

47 A. ComEd's Schedule of Rates is the formal compilation of ComEd's retail tariffs filed with
48 the ICC under a numbering system as mandated by the ICC in 83 Ill. Adm. Code
49 § 255.30.

50 Q. What is the overall structure of ComEd's Schedule of Rates?

51 A. ComEd's Schedule of Rates has an overall consistent structure that has developed over
52 many years, although the structure is constrained to some degree by the numbering
53 system mandated by the ICC. ComEd's Schedule of Rates is organized as follows:

- 54 • Title Page
- 55 • Table of Contents
- 56 • Preliminary Statement
- 57 • A list of geographic areas to which the Schedule of Rates is applicable
- 58 • Bundled services rates
- 59 • Terms and Conditions of general applicability
- 60 • Riders of general applicability
- 61 • Information regarding bill formats
- 62 • Delivery services related rates
- 63 • Riders related specifically to delivery services related rates
- 64 • ComEd's Rate for Retail Electric Suppliers (RESs)
- 65 • ComEd's single bill option rider for RESs.

66 Q. Is ComEd's Schedule of Rates available to the public?

67 A. Yes, it is. ComEd's Schedule of Rates is available for public inspection in hard copy
68 form, in accordance with 83 Ill. Adm. Code §255.20. In addition, ComEd provides an
69 electronic version of its Schedule of Rates in Portable Document Format (PDF) on
70 ComEd's World Wide Web site. The availability of ComEd's Schedule of Rates in this
71 manner via the Internet complies with the agreement reached for item # 1 in the Other
72 Tariff Issues section of the Stipulation, which states that "[t]he utilities agree to post

73 information concerning Commission-approved changes to a utility's delivery services
74 tariffs and related informational filings on their web sites."

75 In the version of its Schedule of Rates that is posted on ComEd's web site, ComEd uses
76 the electronic "bookmark" feature of the Adobe Acrobat Exchange software as an
77 "electronic index" to provide users with an easy and convenient way to quickly navigate
78 to the tariff of their choice with the simple click of a mouse button. ComEd's Schedule
79 of Rates PDF file is designed to automatically display these electronic "bookmarks" on
80 the left-hand side of the user's computer screen with the Title Page "bookmark" selected
81 as the default when the user opens the file. The electronic "bookmarks" in ComEd's
82 Schedule of Rates PDF file are currently listed in a fashion similar to the order of tariffs
83 in the Schedule of Rates as on file with the ICC, except that for ease of locating rates and
84 riders, all "bookmarks" for rates are grouped together (including the "bookmarks" for
85 delivery services related rates) and all "bookmarks" for riders are grouped together
86 (including the "bookmarks" for delivery services related riders). In addition, the Bill
87 Format "bookmark" follows the Terms and Conditions "bookmark".

88 Q. How can a user find what they need in ComEd's Schedule of Rates PDF file?

89 A. Once a user accesses ComEd's Schedule of Rates PDF file from ComEd's web site on
90 the Internet and opens the file using the Adobe Acrobat Reader software, which is a free
91 download from Adobe's Web site, the user can navigate the file in a variety of ways. The
92 "bookmark" feature and the "text search" feature, which allows a user to search the entire
93 file for a string of text, are among two of the Adobe software's most useful file
94 navigation features available. Using the Adobe Acrobat Exchange software, ComEd can
95 easily reorganize these electronic "bookmarks" in any order that is desirable. By using

96 these "electronic bookmarks" in ComEd's Schedule of Rates PDF file, the actual
97 placement of the tariffs within the file itself is transparent to the user.

98 To visually illustrate ComEd's electronic "bookmark" concept that I described above, I
99 have included a screen print from ComEd's electronic version of its Schedule of Rates as
100 Attachment A to my testimony. In summary, this "bookmark" feature of ComEd's
101 electronic version of its Schedule of Rates provides ComEd with a convenient means to
102 present its tariffs in an extremely flexible and user-friendly fashion that enhances the
103 usability of ComEd's Schedule of Rates.

104 Q. What functions are served by ComEd's rates and riders?

105 A. Rates and riders are legal documents that govern various aspects of the relationship
106 between ComEd and its customers. Tariffs generally have complicated subject matters,
107 often including technical matters. Precision in tariff language is essential in order that
108 tariffs may be practically applied on a day-to-day basis, to prevent or minimize disputes,
109 and to promptly and efficiently resolve any disputes that do arise. This is particularly
110 true for a utility the size of ComEd with its many customers and their varying
111 circumstances. In general, the principle functions of a rate include defining with
112 precision to whom the rate is available or applicable, what services ComEd offers
113 thereunder, and on what terms and conditions ComEd offers these services. Riders, as
114 their name suggests, are applicable to one or more rates, and often address a more
115 specific, and a sometimes optional, service element.

116 Q. What functions are served by Terms and Conditions?

117 A. Numerous definitions and general terms and conditions are common among nearly all of
118 ComEd's rates and riders. A number of those common definitions and general terms and

conditions, rather than being duplicated in each such rate or rider, therefore are set forth in Terms and Conditions. The rates and riders then expressly incorporate Terms and Conditions. That makes the individual rates and riders and the overall Schedule of Rates substantially shorter, less repetitive, and easier to read.

Q. Mr. Alongi, why does ComEd not include all of the common definitions from its Terms and Conditions in its delivery services tariffs?

A. ComEd has tried to place within the body of its delivery services tariffs only those definitions that facilitate understanding of the particular rate or rider. Adding all of the common definitions that appear in Terms and Conditions to each delivery services rate and rider would add approximately two single-spaced pages to each rate and rider. As I indicated earlier, that would make the rates and riders not only longer, but repetitive. Consequently, many common definitions are more appropriately placed exclusively in Terms and Conditions. If any party can identify any particular definitions that would be helpful to add to particular rates and riders, then ComEd is open to considering appropriate revisions, but wholesale repetition of common definitions appears to be unwarranted and counter-productive.

Q. How has ComEd structured its delivery services tariffs?

A. ComEd has structured its delivery services related tariffs similar to the structure of its bundled service tariffs. That is, each of ComEd's delivery services related tariffs and bundled service tariffs are structured in sections and subsections, by topic. Topics that are common among tariffs (such as availability or applicability, charges, term of contract or term of service, and general) are presented in much the same order from tariff to tariff. Other topics that are unique to a particular tariff have been incorporated into the

appropriate tariff in a location adjacent to topics of related subject matter. In this way, users of ComEd's tariffs are presented with a consistent organizational structure which facilitates finding information and comparing ComEd's bundled rates and delivery services rates and riders.

Q. Is ComEd going to file revisions to its tariffs in accordance with the Commission's Interim Order dated October 18, 2000, in this docket and the Stipulation attached thereto?

A. Yes. ComEd will file revisions to Rider TS – Transition Service (“Rider TS”) and any other tariffs that reference Rider TS to change the name of Rider TS to Rider ISS - Interim Supply Service (“Rider ISS”). In addition, ComEd will file revisions to Rider SBO – Single Bill Option (“Rider SBO”) for two purposes: (1) to remove the requirement for a Retail Electric Supplier (“RES”) to include ComEd's logo on bills that the RES issues pursuant to Rider SBO and (2) to remove any language that imposes bill format requirements on bills that the RES issues pursuant to Rider SBO that are in addition to those requirements contained in the Public Utilities Act and applicable administrative rules. These tariff revisions will be effective January 1, 2001. My understanding is that due to the level of programming requirements related to implementing metering service unbundling, the revisions to ComEd's billing system to implement the change of the name from Transition Service to Interim Supply Service on customers' bills will be completed on or about March 1, 2001.

Definition Of Class Of Customers With Individual CTCs

Q. How and where the class of customers with individual Customer Transition Charges (“CTCs”) defined in ComEd's Schedule of Rates?

164 A. As approved by the Commission, the class of customers with individual CTCs is defined
165 in "Rate CTC – Customer Transition Charge" ("Rate CTC") of ComEd's Schedule of
166 Rates in the Customer-specific CTC subsection of the Charges section. Rate CTC
167 specifies:

168 Customer-specific CTCs shall be calculated for any nonresidential retail
169 customer (i) for which such customer's average monthly maximum
170 electrical demand on the Company's system during the six months with
171 the customer's highest monthly maximum demands in the three-year-
172 period ending June 30, 1999, equals or exceeds 3 megawatts, or (ii) if in
173 the Company's reasonable judgment there exists comparable usage
174 information or a sufficient basis to determine that the retail customer
175 would have electrical demands as described in clause (i), or (iii) that had
176 been taking service under the following tariffs during the year preceding
177 the original effective date of this tariff:

178 Rate 18 – Standby Service
179 Rider 26 – Interruptible Service
180 Rider 27 – Displacement of Self Generation
181 Customer-specific Electric Service Contracts

182 (Rate CTC, Original Sheet No. 137).

183
184 Default Service

185 Q. Please identify ComEd's default service (also known as Interim Supply Service) tariff.

186 A. In brief, ComEd's default service tariff, currently Rider TS, is designed to provide
187 electric power and energy to a delivery services customer in specific situations that are
188 described in the Applicability section of the tariff in which the customer is left with no
189 other provider of electric power and energy supply services. Such situations may occur,
190 for example, if ComEd determines that the customer's RES stops providing electric
191 power and energy service to retail customers or ComEd receives a drop Direct Access
192 Service Request (DASR) for the customer but ComEd does not receive a DASR to switch
193 the customer to another supplier in accordance with the Switching Suppliers section of

194 Rate RCDS - Retail Customer Delivery Service - Nonresidential. Rider TS is a service
195 provided by ComEd on a voluntary basis that incorporates market-based prices.

196 Q. Does this conclude your testimony?

197 A. Yes.

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